

**UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION**

UNITED STATES OF AMERICA,	)	
	)	
Plaintiff,	)	
	)	
v.	)	Civil Action No. 1:16-cv-03088-
	)	ELR
STATE OF GEORGIA,	)	
	)	
Defendant.	)	
	)	

**JOINT MOTION FOR ENTRY OF PROTECTIVE ORDER**

NOW COME Plaintiff United States of America and Defendant State of Georgia (collectively “Parties”), by and through the undersigned counsel, and jointly move the Court for entry of the attached Protective Order (“Proposed Protective Order”).

As set forth in the Parties Joint Preliminary Report and Discovery Plan, the Parties have conferred and agreed upon the attached Proposed Protective Order to govern discovery-related issues. *See* Dkt. 68, 71.

Wherefore, the Parties respectfully request the Court enter the attached Proposed Order.

DATED: August 10, 2020

Agreed to by Counsel for the Parties:

**On Behalf of Plaintiff:**

Shaheena A. Simons  
Chief  
Educational Opportunities Section

Renee M. Wohlenhaus  
Deputy Chief  
Educational Opportunities Section

Andrea E. Hamilton  
Victoria M. Lill  
Laura C. Tayloe  
Michelle L. Tucker  
  
Trial Attorneys, Civil Rights Division

/s/ Andrea E. Hamilton

Andrea E. Hamilton

NC Bar Number: 42878  
United States Department of Justice  
Civil Rights Division  
950 Pennsylvania Avenue, NW  
Washington, DC 20530  
(202)514-4092

andrea.hamilton@usdoj.gov

**On Behalf of Defendant:**

Christopher M. Carr  
Attorney General  
State of Georgia  
Georgia Bar No. 112505

Russell D. Willard  
Senior Assistant Attorney General  
Georgia Bar No. 7760280

State Law Department  
40 Capitol Square, S.W.  
Atlanta, Georgia 30334  
Telephone: (404) 656-3357  
Facsimile: (404) 463-1062

Josh Belinfante  
Georgia Bar No. 047399  
jbelinfante@robbinsfirm.com

/s/ Alexa R. Ross  
(w/express permission Aileen Bell  
Hughes)

Alexa R. Ross  
Georgia Bar No. 614986  
aross@robbinsfirm.com

Byung J. “BJAY” Pak  
United States Attorney  
Northern District of Georgia

s/ Aileen Bell Hughes  
Aileen Bell Hughes  
GA Bar Number: 375505  
Assistant United States Attorney  
United States Department of Justice  
Richard B. Russell Federal Building  
75 Ted Turner Dr. SW  
Suite 600  
Atlanta, GA 30303-3309  
(404) 581.6000  
aileen.bell.hughes@usdoj.gov

Special Assistant Attorneys General  
Robbins Ross Alloy Belinfante  
Littlefield LLC  
500 14th Street, NW  
Atlanta, GA 30318  
Telephone: (678) 701-9381

**L.R. 7.1(D) CERTIFICATION**

I certify that the Proposed Joint Motion for Entry of Protective Order has been prepared with one of the font and point selections approved by the Court in Local Rule 5.1(C). Specifically, this brief has been prepared using 14-pt Times New Roman Font.

This 10<sup>th</sup> day of August, 2020.

/s/ Aileen Bell Hughes  
AILEEN BELL HUGHES  
ASSISTANT U.S. ATTORNEY

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION

UNITED STATES OF AMERICA,	)	
	)	
Plaintiff,	)	
v.	)	CIVIL ACTION NO.
	)	1:16-CV-03088-ELR
THE STATE OF GEORGIA,	)	
	)	
Defendant.	)	
_____	)	

**ORDER GRANTING THE JOINT MOTION FOR ENTRY**  
**OF PROTECTIVE ORDER**

The Court has considered the Parties' Joint Motion for Entry of Protective Order, and for good cause shown, the Motion is hereby GRANTED.

SO ORDERED, this \_\_ day of \_\_\_\_\_, 2020.

\_\_\_\_\_  
ELEANOR L. ROSS  
UNITED STATES DISTRICT COURT